

THE LAW FIRM OF

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MEMORANDUM ENDORSED

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April 5, 2023

Via ECF

The Honorable Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Madrid, et al.*, 16 Cr. 680 (GHW)

Dear Judge Woods,

As the Court is aware, on March 31, 2023, Alexei Schacht filed a notice of appearance on behalf of Cornelio Cazarez Madrid. Pursuant to the Court's individual rules, as attorney of record for Mr. Cazarez Madrid, I ask that the Court schedule a substitution of counsel hearing or endorse this letter to permit my co-counsel and me to withdraw from this matter. I note that Mr. Schacht's appearance came as a surprise to me and very clearly communicates the breakdown of Mr. Cazarez Madrid's confidence in my representation. I have spoken with Mr. Schacht regarding the case and would be prepared to electronically share all necessary files once the Court approves the substitution of counsel.

Respectfully submitted,

/s/


César de Castro
Shannon McManus

Application denied without prejudice. Local Rule of Criminal Procedure 1.1 requires compliance with Local Rule of Civil Procedure 1.4 with respect to any application for the withdrawal of counsel. To the extent that counsel for Mr. Madrid wishes to withdraw as counsel in this matter, they should submit an application compliant with Local Rule of Civil Procedure 1.4. To the extent that counsel is seeking to withdraw as counsel because they have been terminated by their client, they may indicate that in their submission. The Court highlights the fact that sentencing with respect to Mr. Madrid is currently scheduled for April 27, 2023, and that the defendant's sentencing submissions are due no later than April 13, 2027. Any application for an adjournment of those deadlines should be made promptly.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 113.

SO ORDERED

Dated: April 6, 2023
New York, New York


GREGORY H. WOODS
United States District Judge

cc: Amanda Houle
Rebekah Donaleski
Assistant United States Attorneys (*via* ECF)

Alexei Schacht, Esq. (*via* ECF)
Howard Leader, Esq. (*via* ECF)